

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA,)
)
 vs.) 2:19-CR-118-MHT
)
)
 CLARENCE WRIGHT LANE, JR.)

MOTION FOR TEMPORARY RELEASE TO ATTEND FUNERAL

Comes now CLARENCE LANE WRIGHT, JR., by and through the undersigned counsel, and moves this court to order the United States Marshals to allow the defendant to attend a funeral for his recently deceased great-grandmother. As grounds, counsel avers the following:

1. The Defendant's great-grandmother, Mattie B. Edwards, lost her life earlier this week.
2. The funeral is scheduled to take place on Monday, September 7, 2020 at 11:00 A.M. at 3152 County Road 377 in Elba, AL.
3. The undersigned has spoken with the United States Marshals Service and has been informed that they sometimes make arrangements, under controlled circumstances, for inmates to attend funerals of relatives. The marshal service requires that overtime fees for three (3) deputy marshals be prepaid by the family.
4. The Defendant's family is not able to pay the anticipated cost of the Marshal's escort. Ms. Vicky Lane, the Defendant's mother, is available to take custody of the Defendant, accompany him to the funeral, and return him to the Marshal's custody when the funeral is over. In this connection, the undersigned notes that

the Defendant entered Federal custody when he voluntarily turned himself in.

5. Due to the extremely limited number of business hours left before the funeral, this motion is being filed without knowledge of the position of the United States.

For the foregoing reasons, the undersigned respectfully requests this Court issue an order allowing Vicky Lane to take custody of the Defendant at 8:00 A.M. on Monday, September 7, 2020, escort him to his great-grandmother's funeral in Elba, Alabama, and return him to the Marshal's custody in Montgomery no later than 5:00 P.M. on the same day.

/s/ William R. Blanchard

WILLIAM R. BLANCHARD

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CERTIFICATE OF SERVICE

I hereby certify that on September 3rd, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: AUSA Eric Counts, and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants: n/a.

Respectfully submitted,

/s/ William R. Blanchard
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